

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

DSCF STANDARD MAIL LOAD LEVELING

DOCKET NO. N2014-1

MOTION TO COMPEL A RESPONSE TO INTERROGATORIES OF DAVID B. POPKIN  
TO THE UNITED STATES POSTAL SERVICE [DBP/USPS-8 through 10]

January 27, 2014

Respectfully submitted,

N20141MTC

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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On January 7, 2014, I submitted ten interrogatories to the United States Postal Service – DBP/USPS-1 through DBP/USPS-10.

On January 14, 2014, the United States Postal Service filed an objection to Interrogatories 8 through 10.

The Postal Service claims that Interrogatories 8 and 9 seek information that has no relevance to any material issue raised by the current request.

DBP/USPS-8        Please confirm, or explain if you are unable to confirm, that five years ago mailers could deposit their Presorted Standard Mail at 100% of the INDEPENDENT Post Offices in the country.

DBP/USPS-9        Subpart [a] Please confirm, or explain if you are unable to confirm, that at the present time there are a number of independent Post Offices which will no longer accept Presorted Standard Mail at their facility and require mailers to bring the mail to another facility.

Subpart [b] Please provide a listing of Districts in the country showing the percentage of INDEPENDENT Post Offices in that District that will no longer accept Presorted Standard Mail.

The current request relates to mail which is deposited directly at the SCF/P&DC and changing the service standards for that mail. It does not include mail that is deposited at a local post office. That mail maintains the existing service standards.

Several years ago the Postal Service eliminated the ability to deposit bulk mail at all offices in the country and required it to be mailed at a limited number of offices. To the extent that this change resulted in more or less mail being deposited at the SCF/P&DC, it is relevant to this Request. I chose 5 years as a point to predate that change in eliminating some BMEU locations.

The Postal Service claims that Interrogatory 10 was litigated in Docket N2012-1.

DBP/USPS-10 When a P&DC is closed after being consolidated with another P&DC, what arrangements are made for the deposit of DSCF Mail at the original location? Will mailers have to bring the mail to the new location? Will arrangements be made to provide acceptance at the old location? Will a nearby post office accept the mail? Please provide approximate percentages for these and other arrangements.

The Postal Service fails to provide information as to the N2012-1 specific locations [page and line numbers in USPS-T-7 or initial brief, or intervenor questions] that this information was discussed. Responses to this interrogatory will affect the volume of mail subject to the change and therefore is relevant. Furthermore, it is noted that the phase of the plant consolidations that was to go into effect in February has been postponed.

For the reasons stated above, I move that the Postal Service be ordered to respond to these interrogatories.